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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ORACLE USA, INC.; a Colorado corporation; ORACLE AMERICA, INC.; a Delaware corporation; and ORACLE INTERNATIONAL CORPORATION, a California corporation,

Plaintiffs,

V.

RIMINI STREET, INC., a Nevada corporation; and SETH RAVIN, an individual,

Defendants.

CASE NO. 2:10-cv-0106-LRH-VCF

**JOINT STIPULATION TO MODIFY
SCHEDULE FOR CERTAIN POST-
INJUNCTION PROCEEDINGS**

RIMINI STREET, INC., a Nevada corporation; and SETH RAVIN, an individual,

Defendants.

Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp. (together, “Oracle”) and Defendants Rimini Street, Inc. and Seth Ravin (together, “Rimini”) (collectively, “Parties”) jointly submit this Stipulation and [Proposed] Order.

WHEREAS, on November 22, 2019, the court entered a minute order setting certain deadlines in this case, including a close of expert discovery on March 27, 2020, a deadline to file a motion for order to show cause on April 15, 2020, a deadline to file an opposition on May 6, 2020, and a deadline to file a reply on May 20, 2020, ECF 1289;

WHEREAS, the extraordinary COVID-19 pandemic has placed many attorneys for both Oracle and Rimini under mandatory shelter-in-place orders which prohibit Non Essential travel. *See, e.g.*, Order of the Health Office No. C19-07, City of San Francisco, Department of Public Health (*available at* <https://www.sfdph.org/dph/alerts/files/HealthOrderC19-07-%20Shelter-in-Place.pdf>); Order of the Health Officer of the County of Santa Clara, County of Santa Clara Public Health Department (*available at* <https://www.sccgov.org/sites/phd/DiseaseInformation/novel-coronavirus/Documents/03-16-20-Health-Officer-Order-to-Shelter-in-Place.pdf>); Order of the Health Officer of the County of San Mateo, San Mateo County Health (*available at* <https://www.smccgov.org/sites/smccgov.org/files/HO%20Order%20Shelter%20in%20Place%2020200316.pdf>);

1 WHEREAS, this COVID-19 pandemic and related orders creates significant concerns
 2 that depositions in this matter can be held legally, safely and efficiently;

3 WHEREAS, the Parties agree to extend the deadlines in this case as described below,
 4 pending approval by the Court; and

5 WHEREAS, the Parties agree to monitor the COVID-19 situation and to promptly
 6 advise the Court regarding the need for any further adjustments to the schedule;

7 THEREFORE, the Parties stipulate, and request that the Court order, that the deadlines
 8 in this case be reset as follows:

Event	Dkt. 1289 deadline	Proposed new deadline
Close of expert discovery	March 27, 2020	May 8, 2020
OSC motion due	April 15, 2020	May 27, 2020
OSC opposition due	May 6, 2020	June 17, 2020
OSC reply due	May 20, 2020	July 1, 2020

16 Dated: March 18, 2020

17 MORGAN, LEWIS & BOCKIUS LLP

19 By: /s/ John A. Polito
 John A. Polito

20 *Attorneys for Plaintiffs Oracle USA, Inc.,*
Oracle America, Inc., and Oracle
International Corporation

16 Dated: March 18, 2020

17 GIBSON, DUNN & CRUTCHER LLP

19 By: /s/ Eric D. Vandeveld
 Eric D. Vandeveld

20 *Attorneys for Defendants Rimini Street, Inc.,*
and Seth Ravin

ATTESTATION OF FILER

The signatories to this document are Eric D. Vandevelde and me, and I have obtained his concurrence to file this document on his behalf.

Dated: March 18, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: _____ /s/ John A. Polito
John A. Polito

Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused to be electronically uploaded a true and correct copy in Adobe “pdf” format of the above document to the United States District Court’s Case Management and Electronic Case Filing (CM/ECF) system. After the electronic filing of a document, service is deemed complete upon transmission of the Notice of Electronic Filing (“NEF”) to the registered CM/ECF users. All counsel of record are registered users.

DATED: March 18, 2020

MORGAN, LEWIS & BOCKIUS LLP

By: _____ /s/ John A. Polito
John A. Polito

Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation